

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-1(b) KARINA PIA LUCID, ESQ., LLC 1065 Route 22 W Suite 2B Bridgewater, New Jersey 08807 Tel: (908) 350-7505 Email: <a href="mailto:klucid@karinalucidlaw.com">klucid@karinalucidlaw.com</a>  Karina Pia Lucid, Esq. <i>Counsel for the Debtor(s), Paul Dolengo</i>	
In Re:	
Paul Dolengo,	
Debtor(s).	

Case No: 23-20473-RG

Chapter 13

Hearing Date: 05/01/2024 at  
2:00 PM

ORAL ARGUMENT:  
REQUESTED, IF TIMELY  
OPPOSITION RECEIVED

### NOTICE OF MOTION TO APPROVE POST-PETITION FUNDING

To: **THE HONORABLE ROSEMARY GAMBARDELLA**  
United States Bankruptcy Court  
For the District of New Jersey

**PLEASE TAKE NOTICE** that on December 6, 2023 at 10:00 a.m. or as soon as counsel may be heard, Paul Dolengo, debtor, in the above-captioned Chapter 13 Debtors (the “Debtor”), by and through his counsel, Karina Pia Lucid, Esq., shall move before the Honorable Rosemary Gambaredella , at the United States Bankruptcy Court, 50 Walnut Street, Newark, NJ 07102, for an order to approve funding..

**PLEASE TAKE FURTHER NOTICE** that in support of the within Motion, the Debtor will rely upon the annexed certification in support of the relief being sought, together with such oral argument as the Court deems necessary. Pursuant to D. N.J. LBR 9013-2, the Debtors state that no brief or memorandum of law is necessary, because of the absence of novel questions of law. However, if any responsive papers are filed in opposition to the motion, the Debtors reserve the right to respond to any issues of law raised therein in the form of a brief or a memorandum of law.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Local Rule 9013-1(d) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, objections, if any, must be in writing, must conform to the requirements of the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the District of New Jersey, set forth the name of the objector, the basis for the objection and the specific grounds therefor, and must be filed with the Clerk of the Court at least seven (7) days prior to the hearing date, or as otherwise indicated, with copies filed simultaneously served upon:

**KARINA PIA LUCID, ESQ.**  
**1065 Route 22 W**  
**Suite 2B**  
**Bridgewater, New Jersey 08807**

**PLEASE TAKE FURTHER NOTICE** that in accordance with Local Rule 9013-1(d) of the Rules of Procedure governing the practice before the United States Bankruptcy Court for the District of New Jersey, failure of any person or entity receiving notice of the Motion to file objections thereto on a timely basis shall be a bar to the assertion of an objection to the entry by the Court of the proposed Order, as same may be modified, and the within Motion shall be deemed uncontested.

KARINA PIA LUCID, ESQ., LLC  
*Counsel for the Debtor(s), Paul Dolengo*

/s/ *Karina Pia Lucid*

Dated: March 26, 2024

Karina Pia Lucid